

**UNITED STATES BANKRUPTCY COURT  
FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In the Matter of:

KEITH ALAN BRYAN  
AND  
DORRI ALLYSON BRYAN

Chapter 13

Case No. 20-11789-KHK

Debtors

**OBJECTION TO CLAIM  
NOTICE OF OBJECTION TO CLAIM  
AND  
NOTICE OF SCHEDULED HEARING ON THIS OBJECTION**

To: LoanCare, LLC  
3637 Sentara Way  
Virginia Beach, VA 23452

Keith Alan Bryan  
Dorri Allyson Bryan  
21067 St. Louis Rd.  
Middleburg, VA 20117

M. Christine Maggard  
Attorney for LoanCare, LLC  
Brock & Scott, PLLC  
484 Viking Dr., Ste. 203  
Virginia Beach, VA 23452

Ronald J. Aiani  
Attorney for Debtors  
86 East Lee Street  
Warrenton, VA 20186

C T Corporation System  
Registered Agent for LoanCare, LLC  
4701 Cox Rd., Ste. 285  
Glen Allen, VA 23060

You have filed a claim in the amount of \$358,844.91 (arrearage of \$41,690.45) with a Court claim number of 3 in this Chapter 13 case.

Thomas P. Gorman, Chapter 13 Trustee, has filed this objection to your filed claim and asks that the remaining balance be disallowed as it is an unliquidated secured claim and relief from the stay has been granted by Order entered March 24, 2021. No claim for the unsecured or deficiency balance has been filed.

**Your claim may be reduced, modified or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before five business days prior to the hearing date, you or your attorney must:

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File with the court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before five business days prior to the scheduled hearing. You must mail a copy to the persons listed below.

**REMOTE HEARING INFORMATION:**

Due to the COVID-19 public health emergency, no in-person hearings are being held.

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the "Zoom Request Form"), which is available on the Court's internet website at [www.vaeb.courts.gov](http://www.vaeb.courts.gov), on the page titled, "Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information." Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

\*\*\* The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge's attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions. \*\*\*

**PLEASE NOTE:** You **MUST** submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.

*Attend the hearing to be held on August 26, 2021 at 1:30 p.m., in Courtroom III on the 3<sup>rd</sup> floor, United States Bankruptcy Court, 200 South Washington Street, Alexandria, VA 22314.* If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Thomas P. Gorman  
300 North Washington Street, Suite 400  
Alexandria, VA 22314

Clerk of the Court  
United States Bankruptcy Court  
200 South Washington Street  
Alexandria, VA 22314

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If you or your attorney do not take these steps, the court will decide that you do not oppose objection to your claim.

Date: July 14, 2021

\_\_\_\_/s/ Thomas P. Gorman\_\_\_\_  
Thomas P. Gorman  
Chapter 13 Trustee  
300 North Washington Street, #400  
Alexandria, VA 22314  
(703) 836-2226  
VSB 26421

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 14th day of July, 2021, served via ECF to authorized users or mailed a true copy of the foregoing Objection to Claim, Notice of Objection, and Notice of Hearing to the parties listed in the heading hereof.

\_\_\_\_/s/ Thomas P. Gorman\_\_\_\_  
Thomas P. Gorman